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AZ CORP COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

In the matter of:

ROBERT PRESTON INGRAM and JANE  
DOE INGRAM, husband and wife,

Respondents.

DOCKET No.: S-20604A-08-0371

**ROBERT PRESTON INGRAM'S  
ANSWER**

In response to the Notice of Opportunity for Hearing Regarding Proposed Order to Cease and Desist, for Restitution, for Administrative Penalties and for other Affirmative Action, Respondent Robert Preston Ingram, by and through his undersign legal counsel, does hereby file his Answer as follows:

1. Admits the allegations of paragraphs 1 and 2, and thereon alleges that during the period in question, Respondent resided in both Scottsdale and Phoenix, Arizona.
2. In answer to paragraph 3, Jane Doe Ingram's true name is Cruzita Ingram, and Respondent disclaims her liability for any of his acts or actions herein alleged, and the balance of the allegations do not require any response.
3. Denies the allegations of paragraph 4.
4. In answer to paragraphs 5 and 6, Respondent does not have information or knowledge sufficient to form a belief as to the truth of the allegations therein.
5. Denies the allegations of paragraph 7.
6. In answer to paragraph 8, Respondent denies that he sent email containing Investment solicitation materials for, or descriptions of, any Prime World Banks or that signing any document would consummate a transaction with a Prime World Bank, and Respondent has

1 no information or knowledge sufficient to form a belief as to the truth of the remaining  
2 allegations therein.

3 7. In answer to paragraph 9, Respondent has no information or knowledge sufficient  
4 to form a belief as to the allegations therein.

5 8. In answer to paragraph 10, Respondent provided no disclosures about any Prime  
6 World Bank or investments therein, and accordingly did not disclose risks associated with  
7 Prime Word Bank transactions.

8 9. In answer to paragraphs 11 and 12, Respondent does not have information or  
9 knowledge sufficient to form a belief as to the truth of the allegations therein.

10 10. In answer to paragraphs 13, 14 and 15, Respondent does not have information or  
11 knowledge sufficient to form a belief as to the allegations therein, and thereon alleges that  
12 Respondent made no filings to register securities with the Arizona Corporation commission.

13 11. In answer to paragraphs 16 and 17, Respondent does not have information or  
14 knowledge sufficient to form a belief as to the allegations therein, and thereon alleges that  
15 Respondent was never registered as a dealer or salesman of securities.

16 12. In answer to paragraphs 18 and 19, Respondent does not have information or  
17 knowledge sufficient to form a belief as to the truth of the allegations therein.

18 13. Any and all allegations not denied or otherwise included in this Answer are  
19 hereby denied.

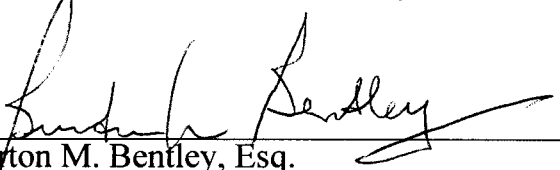
20 14. First Affirmative Defense: The Commission's allegations set forth in Article III  
21 FACTS are too general and too conclusive in nature to be susceptible of an intelligent response  
22 in that nothing by way of documentation is attached to the Notice that explains the allegations.

23 15. Second Affirmative Defense: an offering to only 8 persons is not a public offer,  
24 and only public offers are the concern of the Securities Division of the Arizona Corporation  
25 Commission.

26 WHEREFORE, having fully answered the allegations set forth, Respondent prays that  
27 the Commission take nothing by its allegations, that the requested relief be denied in toto, and  
28 that the Hearing as requested be heard as scheduled.

1 RESPECTFULLY SUBMITTED this 2<sup>nd</sup> day of September, 2008.

2 THE BENTLEY LAW FIRM, P.C.

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7 Burton M. Bentley, Esq.  
8 Attorney for Respondents

9 Original and thirteen (13) copies  
10 hand-delivered this 2<sup>nd</sup> day of  
11 September, 2008, to:

12 Docket Control  
13 Arizona Corporation Commission  
14 1200 West Washington  
15 Phoenix, Arizona 85007

16 Copy of the foregoing hand-delivered  
17 this 2<sup>nd</sup> day of September, 2008, to:

18 Mike Dailey  
19 Arizona Corporation Commission  
20 1300 West Washington, 3<sup>rd</sup> Floor  
21 Phoenix, Arizona 85007

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